

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA**

THE CITY OF HUNTINGTON,
Plaintiff,

v.

Civil Action No. 3:17-01362

AMERISOURCEBERGEN DRUG
CORPORATION, et al.
Defendants.

CABELL COUNTY COMMISSION,
Plaintiff,

v.

Civil Action No. 3:17-01665

AMERISOURCEBERGEN DRUG
CORPORATION, et al.
Defendants.

**PLAINTIFFS' NOTICE OF RULE 30(b)(6) REMOTE
VIDEOTAPED DEPOSITION OF IQVIA**

PLEASE TAKE NOTICE that in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure and pursuant to the applicable Federal Rules of Civil Procedure as well as all other orders and rules governing this litigation, Plaintiffs, by and through undersigned counsel, will take the oral videotaped deposition of **IQVIA**, on **April 9, 2021 at 10:00 AM (Eastern Standard Time) remotely** or another date, time, and location to be determined at the mutual convenience of the parties on the following subject matters.

1. Validation and authentication of the "IQVIA data concerning opioids from 1997 to the present from the following products Allergan has purchased: XPONENT and XPONENT PLANTRAK," referenced in the July 25, 2018 letter from Maureen Nakly to Donald P. Bunnin (copy attached as Exhibit 1) (the "IQVIA Data"), including but not limited to:

- a. Explanation of the source(s) for the IQVIA Data;
- b. Explanation of the contents of the IQVIA Data;

- c. Explanation of the methods in which the IQVIA Data is maintained;
- d. Explanation of whether IQVIA maintains the IQVIA Data in the regular course of its business; and
- e. Explanation of the purposes for which IQVIA uses the IQVIA Data.

2. Whether AmerisourceBergen Drug Corporation, Cardinal Health, Inc. or McKesson Drug Corporation have or had access to databases containing the IQVIA Data.

Attached hereto as Exhibit 2 is a copy of the subpoena to IQVIA for attendance at the deposition.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court reporting services and video recording services will be provided by Golkow Global Litigation Services. Parties who wish to attend may RSVP to the deposition by emailing scheduling@golkow.com.

Dated: March 16, 2021

Respectfully submitted,

THE CITY OF HUNTINGTON

CABELL COUNTY COMMISSION

/s/ Anne McGinness Kearse

Anne McGinness Kearse (WVSB No. 12547)

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CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2021, the PLAINTIFFS' NOTICE OF RULE 30(b)(6) REMOTE VIDEOTAPED DEPOSITION OF IQVIA was served on all counsel via email only to plaintiffs' listserv at mdl2804discovery@motleyrice.com and defendants' listservs at track2opioddefendants@reedsmith.com.

/s/ Monique Christenson

Monique Christenson (SC Bar No. 104063)
Motley Rice LLC